

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kolby Andrews

Case No. 25-30156

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 11, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

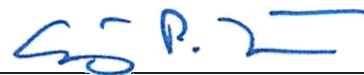
This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 19, 2025City and state: Detroit, MI*Complainant's signature*

Neil Gavin, Special Agent

Printed name and title*Judge's signature*

Hon. Anthony P. Patti, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Neil Gavin, having been duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since March 2004. I have experience in the investigation, apprehension, and prosecution of individuals involved in federal criminal offenses. I am currently assigned to the Detroit FBI Violent Gang Task Force (“VGTF”) and conduct investigations into street gangs committing various violations of federal law, to include narcotics and weapons trafficking and violent crime. Prior to my current assignment, I was assigned to the Kansas City FBI where I conducted investigations involving narcotics and weapons trafficking, violent gangs, and violent crime. For most of my career, I have conducted investigations into violent street gangs. I have experience investigating gangs and the violations of federal law associated with gang-related crime, including narcotics trafficking, weapons possession and trafficking, and violent crimes such as assaults, shootings, and murders.

2. This affidavit is being submitted in support of a criminal complaint alleging that KOLBY ANDREWS has violated 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging KOLBY

ANDREWS with the above-listed violation, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

4. On March 11, 2024, at approximately 11:00 PM, Detroit Police (DPD) officers observed a white 2024 Jeep Grand Cherokee driving northbound on Chalmers in Detroit, Michigan. DPD conducted a traffic stop on the vehicle and identified the driver as KOLBY ANDREWS. There was a female seated in the front passenger seat, who officers identified and is hereinafter referred to as “Passenger.” There was also an unidentified female seated in the rear passenger seat. ANDREWS did not possess a valid driver’s license. Passenger told officers she had a valid driver’s license and that the vehicle was hers. While Passenger was opening the glove box, officers observed multiple baby bottles filled with green liquid consistent with the street drug known as “lean.” “Lean” is a mixture of Promethazine/Codeine, a Schedule V controlled substance, and juice or soda.

5. An officer asked ANDREWS to step out of the vehicle, placed ANDREWS in handcuffs, and placed him the rear seat of the officer’s scout car. When officers returned to the vehicle ANDREWS had been driving, they noticed the barrel of a firearm sticking out from under the driver’s seat in plain view. Moments later, officers noticed ANDREWS had exited the rear of the scout car

and was running away from the scene, still handcuffed. Officers quickly secured the firearm from under the front seat of the vehicle and pursued ANDREWS.

ANDREWS was not immediately located, and when officers returned to the scene of the traffic stop, Passenger and the white Jeep were gone. While canvassing the area for ANDREWS, officers were flagged down by a citizen who informed them that a handcuffed individual had just been picked up by a white Jeep Cherokee in the area.

6. A short time later, Passenger turned herself into DPD at the 9th Precinct. Passenger was arrested by DPD and charged with obstruction. Passenger denied any knowledge of the firearm that had been recovered from under the driver's seat of the vehicle.

7. DPD officers eventually located and arrested ANDREWS on March 13, 2025.

8. On March 14, 2025, Special Agent Michael Jacobs, an interstate nexus expert with the Bureau of Alcohol, Tobacco, and Firearms, reviewed the details of the Norinco MAK-90 7.62 rifle bearing serial number 9306672, recovered from under the driver's seat where ANDREWS was sitting, and advised the firearm was manufactured outside of the State of Michigan, and therefore has traveled in or affected interstate commerce.

9. KOLBY ANDREWS was convicted of a crime punishable by more than one year of imprisonment before March 11, 2025. Specifically, in 2023, he was convicted of Carrying a Concealed Weapon in the Third Judicial Circuit Court of Michigan in Wayne County, Michigan. ANDREWS is currently on probation in connection with this offense.

10. Based on the above, there is probable cause to believe that on March 11, 2025, KOLBY ANDREWS unlawfully possessed a firearm, in violation of 18 U.S.C. § 922(g)(1).



Special Agent Neil Gavin
Federal Bureau of Investigations

Sworn to before me and signed in my presence and/or by reliable electronic means



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: March 19, 2025